

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS**

KINGERY PRINTING COMPANY,)	
)	
Plaintiff,)	Case No.: 3:24-cv-2328-SPM
)	
vs.)	
)	
THE LAMPO GROUP, LLC a/k/a RAMSEY)	
SOLUTIONS,)	
)	
Defendant.)	

DEFENDANT’S MOTION TO STAY PROCEEDINGS

Defendant The Lampo Group, LLC a/k/a Ramsey Solutions (“Ramsey Solutions”) respectfully moves to stay all proceedings in this action for 21 days, including staying the deadline for Ramsey Solutions to file its responsive pleading, to facilitate ongoing settlement discussions between the parties. Plaintiff Kingery Printing Company (“Kingery”) does not oppose the relief requested. In support of this Motion, Ramsey Solutions states as follows:

1. Kingery filed this action on September 13, 2024.
2. Ramsey Solutions removed this action on October 16, 2024.
3. The parties currently are engaging in good faith settlement negotiations regarding resolution of the claims asserted in this action.
4. In order to facilitate those discussions – and to avoid requiring Ramsey Solutions to file the responsive pleading that otherwise would be due on October 23, 2024 pursuant to Fed. R. Civ. P. 81(c) – Ramsey Solutions requests a brief, 21-day stay.
5. If the settlement negotiations are not successful, Ramsey Solutions will file its responsive pleading on or before November 13, 2024.

6. Kingery will have until on or before December 6, 2024, to file a Motion to Remand the matter, should it choose to file such a motion.

7. A temporary stay will not prejudice any party, as all parties are committed to actively pursuing settlement.

8. Counsel for Kingery has reviewed this Motion, and Kingery does not oppose the relief requested.

WHEREFORE, Ramsey Solutions respectfully requests that this Court grant this Motion enter an order staying all proceedings in this action for 21 days.

Dated: October 18, 2024

Respectfully submitted,

By: /s/ Scott T. Schutte

Scott T. Schutte

Spenser B. Jaenichen

MORGAN, LEWIS & BOCKIUS LLP

110 North Wacker Drive, Suite 2800

Chicago, IL 60606-1511

Phone: 312.324.1000

Fax: 312.324.1001

scott.schutte@morganlewis.com

spenser.jaenichen@morganlewis.com

*Counsel for Defendant The Lampo Group, LLC
a/k/a Ramsey Solutions*

CERTIFICATE OF SERVICE

I, Scott T. Schutte, an attorney, certify that I filed the foregoing using the Court's ECF system, which will cause a true and correct copy of the same to be served electronically on all ECF-registered counsel of record on this 18th day of October, 2024.

/s/ Scott T. Schutte

Scott T. Schutte